

Federal Defenders
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April 28, 2021

Via Email and ECF

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Brendan Hunt*, 21-cr-0086-PKC

Your Honor:

We write seeking two minor amendments to the Court's Proposed Charge:

Page 19, first paragraph, we seek the following addition in bold:

But evidence, **or lack of evidence**, that Defendant made plans, efforts, or had the means and know-how to follow through on the alleged threats may inform your view of the circumstances in which he made the statements and the effect he intended the statements themselves to have.

On the Verdict Form, we request that the Court change the term "threat" to "true threat" to be consistent with the substantive instructions and the law.

Thank You for Your consideration.

Respectfully Submitted,
/s/
Jan A. Rostal
Leticia M. Olivera

cc: Counsel of Record